

CLERK'S OFFICE U.S. DISTRICT. COURT AT LYNCHBURG, VA FILED

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

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UNITED STATES OF AMERICA)	
v.)	Criminal No.: 3:22-CR-00008
DAMON WILLIAMS)	

STATEMENT OF FACTS

The parties stipulate that the allegations contained in the Indictment and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt.

Traevon GRAY planned to rob a marijuana dealer. GRAY and the marijuana dealer know each other from school, and GRAY has been to the marijuana dealer's house in Albemarle County on different occasions. Albemarle County is located in the Western District of Virginia. To further his plan, GRAY recruited Damon WILLIAMS.

On October 26, 2021, WILLIAMS traveled from South Carolina to GRAY's home in Albemarle County, where WILLIAMS and GRAY further planned the robbery. On the morning of October 27, 2021, GRAY and WILLIAMS entered the marijuana dealer's residence in Albemarle County through a back door and without permission of any resident of the home. Both were armed with firearms. Once inside, they located D.S., a resident of the home, and forced him from his upstairs bedroom to the downstairs kitchen. In the kitchen, they ordered him to lay face down on the floor, where either GRAY or WILLIAMS held D.S. at gunpoint while the other searched the residence. At some point, GRAY and WILLIAMS took D.S.'s cellphone. GRAY then tied D.S.'s hands, duct taped his mouth, punched him in the face, and pushed him into a kitchen pantry. GRAY and WILLIAMS fled the residence with approximately two pounds of marijuana, THC wax, several thousand dollars in cash, a firearm belonging to the marijuana dealer, and other items.

After the robbery, GRAY and WILLIAMS drove to Spartanburg, South Carolina, where they divided up the robbery proceeds and photographed themselves with the drug proceeds they had stolen. At his arrest, federal agents seized the stolen firearm from GRAY's residence, along with another firearm. At his arrest, federal agents seized \$8400 in US currency, marijuana, and THC wax from WILLIAMS's residence.

GRAY's and WILLIAMS's actions affected interstate commerce.

Defendant's Initials: 🕰

The actions taken by WILLIAMS as described above were taken willfully, knowingly, and with the specific intent to violate the law. WILLIAMS did not take those actions by accident, mistake, or with the belief that they did not violate the law. WILLIAMS acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

Respectfully submitted,

Heather L. Carlton

Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Damon WILLIAMS, Defendant

I am Damon WILLIAMS's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts it an informed and voluntary one.

Carlos Moreno, Esquire Counsel for Defendant

Defendant's Initials:

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